

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JULIO AGOSTO CUEVAS

TERESA LUGO DIEPPA

Debtors

Reverse Mortgage Solutions, Inc.

Secured creditor

CASE NO. 15-04841-MCF13

CHAPTER 13

AGREED ORDER

TO THE HONORABLE COURT:

Come now, Debtor and Reverse Mortgage Solutions, Inc., ("RMS"), secured creditor, represented by the undersigned attorneys, respectfully pray and state as follows:

Whereas: RMS is a secured creditor by virtue of a perfected mortgage that encumbers a real property located at CC-37 18th St. Villas Guadalupe, Caguas, Puerto Rico 00725.;

Whereas, RMS filed secured claim in the above captioned case. The security for this claim consists of a duly recorded mortgage over a the property mentioned above;

Whereas, RMS filed secured proof of claim asserting the indebtedness of the Debtors regarding the property;

Whereas, the herein parties, and with the interest in expediting uncontested matters, have agreed to file this agreement pursuant to the following,

Terms and Conditions

1. The Preamble forms an integral part of the foregoing agreement.
2. The parties recognize and admit that RMS holds a perfected security interest over the real property of the estate described in the Preamble.
3. Debtor agrees and recognizes the arrears and total amount owed is \$2,838.27 (without including legal fees) and proposes to cure all post-petition arrears as follows:
 - a. Debtor will file an Amended Plan to include the post-petition arrear amount of \$2,838.27
 - b. RMS will file an Amended Proof of Claim to include the Post-Petition arrear amount.
 - c. Debtor further agrees to maintain current all future payment of insurance and property taxes. In the event that debtor hereinafter incurs in arrears of insurance and property taxes payments while the above referenced bankruptcy case is active, RMS will then be enabled to request entry of and order lifting the automatic stay by referencing this agreement with 21 day notice to debtor and his counsel.

WHEREFORE the appearing parties pray from this Honorable Court to consider settlement, and to enter an Order approving the herein Settlement Agreement.

NOTICE TO CREDITORS AND PARTIES IN INTEREST

RESPONSE TIME REQUIRED BY LOCAL BANKRUPTCY RULE 9013-1(c)(1)

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Federal Rule of Bankruptcy Procedure 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

In San Juan, Puerto Rico, on the 5th day of December, 2019.

FOR:	FOR:
Reverse Mortgage Solutions Inc.	DEBTORS
Francisco J. Cardona Esq. Attorney for RMS- 100 CLL Acuarela Street s.303 Guaynabo, PR 00969-0000 Tel.: (787) 988-7135 Fax No. (787) 724-1369 E-mail: fcardona@rascrane.com	Attorney for Debtor(s) JOSE A LEON LANDRAU PO BOX 1687 CAGUAS, PR 00726 Tel. 787 746-7979 Fax : 787 744-4544 Email: jleonlandrau@yahoo.com
By: /s/Francisco J. Cardona USDC 230309 fcardona@rascrane.com	By: /s/ JOSE A LEON LANDRAU , ESQ. USDC 131506 jleonlandrau@yahoo.com

CERTIFICATE OF ELECTRONIC FILING AND SERVICE

I hereby certify that on this date copy of this Agreement has been electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to: Jose Leon Landrau., attorneys for Debtors, Chapter 13Trustee, and all parties CM/ECF participant.

This 5th day of December, 2019.

By: /s/Francisco J. Cardona Esq.